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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

|  |   |                                  |
|--|---|----------------------------------|
| PONDEROSA RESOURCES CORPORATION,                                     | ) |                                  |
|  | ) |                                  |
| Petitioner,  | ) |                                  |
|  | ) |                                  |
| v.   | ) | Civil Case No. 1:24-cv-00141-SWS |
|  | ) |                                  |
| THE UNITED STATES BUREAU OF LAND<br>MANAGEMENT, ANDREW ARCHULETA, in | ) |                                  |
| his official capacity as Wyoming State Director                      | ) |                                  |
| for the U.S. Bureau of Land Management,                              | ) |                                  |
| and THE UNITED STATES DEPARTMENT                                     | ) |                                  |
| OF THE INTERIOR,   | ) |                                  |
|  | ) |                                  |
| Respondents.   | ) |                                  |
|  | ) |                                  |

**JOINT MOTION TO EXTEND THE DEADLINES FOR  
ADMINISTRATIVE RECORD MOTIONS AND OPENING BRIEF**

Petitioner and Respondents jointly move to extend by 90 days the deadline for Petitioner

to file motions to complete the administrative record or for consideration of extra-record evidence, as well as the deadline for Petitioner's opening brief in the absence of such a motion. In support of this request, the Parties state as follows:

1. Respondents lodged the administrative records for this case on December 5, 2024. Dkt. 26.
2. Petitioner identified additional documents and information that it believes should be included in one or more of the administrative records and requested that Respondents complete the administrative records with those materials.
3. To allow the Parties additional time to confer about the contents of the administrative records and resolve potential disputes, the Court granted an extension of the deadline for Petitioner to file motions to complete the administrative record or for consideration of extra-record evidence, as well as the deadline for Petitioner's opening brief in the absence of such a motion. Dkt. 28.
4. Counsel for Petitioner and Counsel for Respondents have conferred about Petitioner's request. Respondents have agreed to include in one of the administrative records certain lease-related documents, including documents related to approval and disposition of bonds or other financial assurances, and to lodge the administrative record for BLM's 2024 oil and gas rulemaking, 89 Fed. Reg. 30916 (April 23, 2024).
5. Petitioner also challenges a rule, 66 Fed. Reg. 1883 (Jan. 10, 2001), promulgated before the launch of Regulations.gov, which revised the rulemaking process under the E-Government Act of 2002, Pub. L. 107-347, 116 Stat. 2899. Because the 2001 rule was not previously challenged in litigation, Respondents have not previously lodged an administrative record for this rule. And employees that worked on the 2001 rulemaking

are no longer employed by Respondents. Respondents have thus searched their archives for a decision file for the rule, but they have not yet been able to locate a consolidated decision file for the challenged 2001 rulemaking. Respondents continue to search for records from that rulemaking process. At Respondents' request, Petitioner has identified select categories of rulemaking-related materials of particular importance. Respondents are focusing their ongoing search efforts on locating those categories of documents.

6. Respondents require additional time to complete the search for records from the 2001 rulemaking process, which involves review of electronic and paper files and indexes of archived materials.
7. Petitioner's current deadline to file motions to complete the administrative records or for consideration of extra-record evidence is January 31, 2025. Dkt. 28. In the absence of such a motion, Petitioner's current deadline to file its opening brief is March 3, 2025. *Id.*
8. Respondents anticipate completing their search for archived materials and lodging completed records by April 1, 2025. After Respondents lodge the completed administrative records, Petitioner will require additional time to review the new materials and identify any remaining administrative record issues for discussion with Respondents.

For the foregoing reasons, the Parties respectfully request that the Court extend Petitioner's deadline to file motions to complete the administrative records or for consideration of extra-record evidence by 90 days, to May 1, 2025, and similarly extend the deadline for Petitioner's opening brief in the absence of administrative record motions to June 2, 2025.

Respectfully submitted this 30th day of January, 2025.

WELBORN SULLIVAN MECK & TOOLEY, P.C.

/s/ Danielle DiMauro

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**CERTIFICATE OF SERVICE**

I certify that on January 30, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF electronic filing system, which will send a notification of this filing to the attorneys of record.

*/s/ Rachel Porter*  
Welborn Sullivan Meck & Tooley, P.C.